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UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

1 ROMAN LINARES, INDIVIDUALLY, AND AS
2 SPECIAL ADMINISTRATOR OF THE ESTATE
3 OF DORA LINARES, DECEASED; GUSTAVO
4 NOGUERA; RANDOLPH MONTENEGRO; and
5 DURELL MONTENEGRO,

6 Plaintiffs,

7 vs.

8 THE GOODYEAR TIRE & RUBBER CO., and
9 GOODYEAR DUNLOP TIRES NORTH
10 AMERICA, LTD., LLC,

11 Defendants.

CASE NO. 2:10-cv-00631-RHL-PAL

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**STIPULATION AND ORDER TO
EXTEND DISCOVERY DEADLINES**
(First Request)

IT IS HEREBY STIPULATED AND AGREED by and between counsel for Plaintiffs and
counsel for Defendants The Goodyear Tire & Rubber Co. and Goodyear Dunlop Tires North
America, Ltd., LLC (collectively “Defendants”) that pursuant to Local Rules 6-1 and 26-4, the
parties respectfully move this Court for an order extending the discovery deadlines in this matter
by ninety (90) days.

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1 Pursuant to Local Rules 6-1 and 26-4, the parties state as follows:

2 (a) Discovery that has been completed:

3 The parties have responded to interrogatories and documents requests. Defendants also
4 have responded to requests for admission. The parties have deposed Plaintiff Roman Linares and
5 the lead investigating police officer.

6 (b) Discovery that remains outstanding:

7 Defendants wish to depose the driver of the vehicle involved in the subject accident and
8 the three plaintiffs who have not yet been deposed. Plaintiffs wish to depose a nurse who was at
9 the accident scene and the first responding police officer. Expert disclosures and discovery also
10 still need to be completed.

11 (c) The reasons why discovery remaining was not completed within the time limits set
12 by the discovery plan:

13 Plaintiffs' expert(s) require certain of Defendants' confidential documents prior to
14 completing their expert report(s) in this matter. The parties could not agree on the form of the
15 protective order to be entered in this case for the production of those confidential documents and
16 therefore engaged in motion practice to resolve their dispute. *See* Docket ## 21, 25, & 27. The
17 Court held a hearing on that issue on March 24, 2011. *See* Docket # 30. The parties currently are
18 drafting a protective order that conforms to the Court's ruling at that hearing. However, Plaintiffs'
19 expert disclosures are due on April 8, 2011, which deadline does not provide sufficient time for
20 Plaintiffs' experts to produce their reports.

21 (d) A proposed schedule for completing all discovery:

22 The parties jointly request that the Court grant a ninety-day extension to all of the
23 remaining discovery deadlines as set forth in this Court's Stipulated Discovery Plan and
24 Scheduling Order dated July 27, 2010 (Docket #12). The revised deadlines would be:
25

26 (1) Discovery Cutoff. Discovery shall be completed by September 30, 2011.
27

1 (2) Expert Disclosures. The disclosure of Plaintiffs' experts and expert reports shall
 2 occur on July 8, 2011. The disclosure of Defendants' experts and expert reports
 3 shall occur on August 9, 2011. The disclosure of rebuttal expert reports shall occur
 4 on August 30, 2011.
 5

6 (3) Dispositive Motions. The parties shall have until October 31, 2011 to file
 7 dispositive motions.
 8

9 (e) Pretrial Order. The pretrial order shall be filed by November 22, 2011.
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11 The current discovery cut-off date is June 30, 2011, such that this stipulation is being filed
 12 more than twenty days before the discovery cut-off date. The parties have not previously filed a
 13 motion for extension of the discovery deadlines. In light of the foregoing, the parties respectfully
 14 submit that there is good cause for the Court to grant the requested extension.
 15

16 DATED this 1st day of April 2011.
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